

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
JEANNETTE FULLER HAUSLER, et al.,	:	
Petitioner,	:	
-against-	:	
JPMORGAN CHASE BANK, N.A., et al.,	:	
Garnishee-Respondents.	:	
	:	09 Civ. 10289 (VM)
	:	ECF Case
-----	X	
JPMORGAN CHASE BANK, N.A., et al.,	:	Related to JPM Chase/Citibank
	:	Turnover Proceeding
Garnishee-Respondents and	:	In Respect of a Judgment
Third-Party Petitioners	:	Entered in the State of Florida,
	:	Case No. 02-12475-CA-09
-against-	:	
BANCO FINANCIERO INTERNACIONAL	:	
S.A., et al.,	:	
Adverse Claimants-	:	
Respondents.	:	
-----	X	

FILED
2011 MAR 18 PM 2:25
S.D. OF N.Y.

MAR 18 2011

MOTION TO ADMIT COUNSEL PRO HAC VICE

PLEASE TAKE NOTICE that Adverse Claimant-Respondent Estudios Mercados y Suministros S.L. and named (but not yet served) Adverse Claimant-Respondent Philips Mexicana S.A. de C. V. move this Court for an order, pursuant to Local Civil Rule 1.3(c) of the Rules of the United States District Court for the Southern District of New York, admitting Ramin

932372

Afshar-Mohajer, Esquire *pro hac vice* to the Bar of this Court for the purpose of appearing and participating in the above-captioned action.

Applicant's Name: Ramin Afshar-Mohajer, Esquire
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 963-5000
Fax Number: (215) 963-5001
Email Address: rafshar-mohajer@morganlewis.com

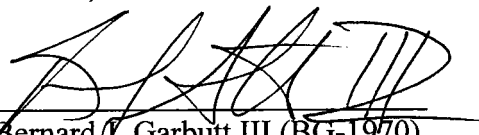
Mr. Afshar-Mohajer is a member in good standing of the bar of the State of New York.

There are no pending disciplinary proceedings against Mr. Afshar-Mohajer in any State or Federal court.

In support of this motion, adverse claimant-respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. submit herewith the affidavit of Bernard J. Garbutt III, sworn to on March 17, 2011.

Dated: New York, New York
March 17, 2011

MORGAN, LEWIS & BOCKIUS LLP

By: 
Bernard J. Garbutt III (BG-1970)
101 Park Avenue
New York, New York 10178-0060
Tel: 212.309.6000
Fax: 212.309.6001

*Attorneys for Adverse Claimant-Respondent
Estudios Mercados y Suministros S.L. and
Named (but not yet served) Adverse Claimant -
Respondent Philips Mexicana S.A. de C.V.*

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Adverse Claimants-	:	
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AFFIDAVIT OF BERNARD J. GARBUTT III
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

I, BERNARD J. GARBUTT III, an attorney admitted to practice law in the United States District Court for the Southern District of New York, being duly sworn, hereby deposes and says the following:

1. I am a partner with the law firm of Morgan, Lewis & Bockius LLP ("Morgan Lewis"), counsel for adverse claimant-respondent Estudios Mercados y Suministros S.L. and named (but

not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. in the above-captioned action. I submit this affidavit in support of the motion to admit Ramin Afshar-Mohajer, Esquire as counsel *pro hac vice* to represent adverse-claimants respondents Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. in this matter.

2. I am a member in good standing of the bar of the State of New York, and I was admitted to practice law in 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.

3 Mr. Afshar-Mohajer is a colleague of mine and an associate in the Philadelphia, Pennsylvania office of Morgan, Lewis & Bockius LLP.

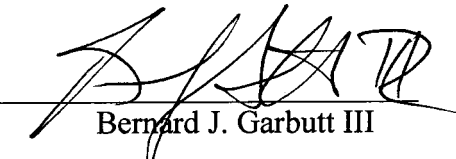
4. Mr. Afshar-Mohajer has been a member of the bar of the state of New York since 2009, and is a member in good standing of this bar. Mr. Afshar-Mohajer's certificate of good standing is attached hereto as Exhibit "A."

5. I have found Mr. Afshar-Mohajer to be a competent attorney. He is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Ramin Afshar-Mohajer, Esquire *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Ramin Afshar-Mohajer, Esquire *pro hac vice*, which is attached hereto as Exhibit "B."

WHEREFORE it is respectfully requested that the motion to admit Ramin Afshar-Mohajer, Esquire *pro hac vice*, to represent adverse claimant-respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. in the above-captioned matter, be granted.


Bernard J. Garbutt III

Sworn to before me this 18th day
of March 2011


Notary Public

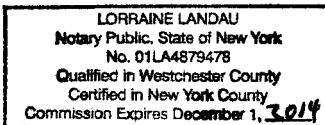


EXHIBIT A

**Appellate Division of the Supreme Court
of the State of New York
First Judicial Department**

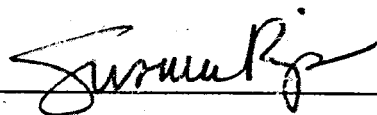
I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

RAMIN AFSHAR-MOHAJER

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on May 4, 2009, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

March 10, 2011



Clerk of the Court

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
Adverse Claimants-	:	
Respondents.	:	

[PROPOSED] ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of adverse claimant-respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant- respondent Philips Mexicana S.A. de C.V., and the affidavit of Bernard J. Garbutt III, sworn to on March , 2011, in support thereof:

IT IS HEREBY ORDERED that:

Applicant's Name: Ramin Afshar-Mohajer, Esquire
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 963-5000
Fax Number: (215) 963-5001
Email Address: rafshar-mohajer@morganlewis.com

is admitted to practice *pro hac vice* as counsel for adverse claimant-respondent Estudios Mercados y Suministros S.L. and named (but not yet served) adverse claimant-respondent Philips Mexicana S.A. de C.V. in the above-captioned action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an Electronic Case Filing (ECF) system password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
March __, 2011

Victor Marrero
United States District Judge

CERTIFICATE OF SERVICE


I, Ramin Afshar-Mohajer, hereby certify that on March 18, 2011, I served a true and correct copy of the foregoing Motion to Admit Counsel Pro Hac Vice and Affidavit of Bernard J. Garbutt III in Support of same upon the following via U.S. Mail and electronic mail.

James L. Kerr
DAVIS POLK & WARDELL LLP
450 Lexington Avenue
New York, NY 10017

Attorneys for Garnishee-Respondents and Joint Third Party Petitioners JP Morgan Chase Bank, N.A., Citibank, N.A., USB AG, The Royal Bank of Scotland N.V. (formerly known as ABN AMRO Bank N.V.) and Bank of America, National Association

James W. Perkins
GREENBERG TRAURIG, LLP
200 Park Avenue, 38th Floor
New York, NY 10166

Attorneys for Petitioner and Adverse Claimant-Respondent Jeannette Fuller Hausler, et al.



Ramin Afshar-Mohajer